

UNITED STATES DISTRICT COURT
NEWARK, NEW JERSEY

RECEIVED, CLERK
U.S. DISTRICT COURT

2003 OCT 22 P 12:45

DARRYL C. WALLS

PLAINTIFF(S)

- VS -

CIVIL NO. 03-4998
(WGB)

VERIZON CONNECTED SOLUTIONS INC.

DEMAND FOR TRIAL BY JURY

YES ☐ NO ☐
(CHECK ONE BOX ONLY)

COMPLAINT

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, as amended, for employment discrimination. Jurisdiction is specifically conferred on this Court by 42 U.S.C. Section 2000e-5. Equitable and other relief are also sought under 42 U.S.C. 2000e-5 (g).

2. Plaintiff(s) resides at 117 SOUTH MORN AVE
Street Address

EAST ORANGE
City

ESSEX
County

N.J.
State

9734148119
Phone Number

FILED

1022-03
AT 8:30
WILLIAM T. WALSH
CLERK

-2- 6820 HOSPITAL DRIVE

3. Defendant(s) lives at, or its business is located at 540 BROAD STREET
 Street Address
ROSE DALE MARYLAND 21237
NEWARK, ESSEX, N.J. 07102
 County State
973 6494710
 Phone Number

4. Please state the address at which you sought employment LOOKING FOR WORK IN
 City
MULTIPLE LOCATIONS IN NEW JERSEY, MARYLAND, AND VIRGINIA
 County State

5. State as nearly as possible when the discriminatory acts occurred:

16TH, NOVEMBER, 2001
 Day Month Year

5a. If practice is continuing check the appropriate box:

YES NO

6. State as nearly as possible when you filed charges with the N.J. Division on Civil Rights regarding defendant's alleged discriminatory conduct:

23RD, JANUARY, 2003
 Day Month Year

7. State as nearly as possible when you filed charges with the Equal Employment Opportunity Commission regarding defendants alleged discriminatory conduct: 23RD
 Day

JANUARY, 2003
 Month Year

8. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to Sue letter which was received by you on

TUESDAY 29TH, JULY, 2003
 Day Month Year

(Note: Please attach Notice-of-Right-to Sue letter to this Complaint)

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9. The acts complained by you, in this suit, concern:

A. ☒ Failure to employ you.

B. ☒ Termination of your employment.

C. ☐ Failure to promote you.

D. ☐ Other acts (please specify) _____

10. Defendant's conduct is discriminatory with respect to which of the following:

A. ☒ Your race

B. ☐ Your Color

C. ☒ Your Sex

D. ☐ Your Religion

E. ☐ Your National Origin

11. A Copy of the charge to the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of your claim.

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12. If relief is not granted, plaintiff will be irreparably denied rights secured by the Title VII of the Civil Rights Act of 1964, as amended.
13. Plaintiff(s) has no adequate remedy at law to redress the wrongs described above.

WHEREFORE, Plaintiff(s) prays (check appropriate letter(s) as follows):

- A. _____ That all fees, costs or security attendant to this litigation be hereby waived pursuant to affidavit of indigence submitted herewith.
- B. ☒ That the Court grant such relief as may be appropriate, including injunctive orders, damages and costs.
- C. ☒ That a trial by jury ☒ is ☐ is not hereby demanded by the plaintiff.
(Circle one)



SIGNATURE OF PLAINTIFF

DISMISSAL AND NOTICE OF RIGHTS

To: **Darryl C. Walls**
147 So. Munn Avenue
East Orange, NJ 07018

From: **Newark Area Office**
1 Newark Center
21st Floor
Newark, NJ 07102

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☐ On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR § 1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

160-2002-01980

Legal Unit

(215) 440-2828

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- ☐ Your allegations did not involve a disability as defined by the Americans with Disabilities Act.
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.
- ☐ Having been given 30 days in which to respond, you failed to provide information, failed to appear or be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve your charge.
- ☐ While reasonable efforts were made to locate you, we were not able to do so.
- ☐ You were given 30 days to accept a reasonable settlement offer that affords full relief for the harm you alleged.
- ☒ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☐ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- ☐ Other (briefly state)

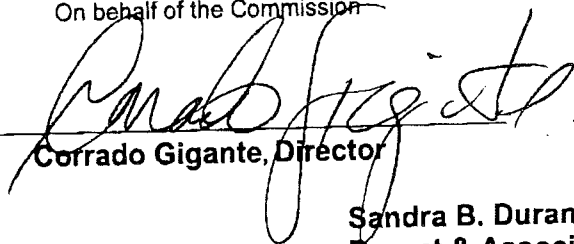
- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS of your receipt of this Notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission


 Corrado Gigante, Director

JUL 25 2003

(Date Mailed)

Enclosure(s)

cc: **Homer M. Mosley**
EEO Management Consultant
VERIZON
540 Broad Street, 14th Floor
Newark, NJ 07102

Sandra B. Durant
Durant & Associates
1560 Broadway, Suite 408
New York, NY 10036

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

☐ FEPA
☒ EEOC

160A201980

NEW JERSEY DIVISION ON CIVIL RIGHTS
State or local Agency, if any

and EEOC

NAME (Indicate Mr., Ms., Mrs.)

Mr. Darryl C. Walls

03 JAN 23 1995

HOME TELEPHONE (Include Area Code)

(973) 414-8114

STREET ADDRESS

147 So. Munn Avenue, East Orange, NJ 07018

DATE OF BIRTH

05/14/1963

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE,
STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

Verizon Connected Solutions, Inc.

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

(973) 649-4710

STREET ADDRESS

540 Broad St., Newark, NJ 07102

CITY, STATE AND ZIP CODE

COUNTY

013

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☒ RACE☐ COLOR☒ SEX☐ RELIGION☐ NATIONAL ORIGIN☐ RETALIATION☐ AGE☐ DISABILITY☐ OTHER (Specify)DATE DISCRIMINATION TOOK PLACE
EARLIEST LATEST

12/16/2001

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

I was hired by this employer on November 13, 1995. My last position was that of Business Manager - Resources. I was promoted to that position in July, 1999. My last performance evaluation, dated June 30, 2001, was rated 4 out of 5.

On November 16, 2001, myself and others were informed by Douglas Crellin, (White) a management official, that we would face a discharge on December 16, 2001. Mr Crellin, stated that the criteria would place more weight on performance evaluations, then seniority. I believe that this employer failed to maintain that standard, in that females and caucasians with less seniority and /or poor qualifications were retained or hired into the positions I sought. Those retained, hired or urged to apply were Diana Collado, Bernard Conahan, Dawn Franco, Rose Ferrara, and others. I was better qualified.

I believe that I was discriminated against by being discharged because of my race (Black) and my sex (male), in violation of Title VII of the Civil Rights Act of 1964, as amended (Title VII).

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Date

1/23/03

Charging Party (Signature)

Darryl C. Walls

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Month, day and year)

1/23/2003